

APPENDIX B**STATUTE OF LIMITATIONS GROUNDS FOR DEFENDANTS' JOINT MOTION TO DISMISS
DIRECT ACTION PLAINTIFFS' COMPLAINTS¹**

Law	Statute of Limitations	Date Claim Accrued	Fraudulent Concealment Allegations	Date of Notice / Discovery	Filing Date	Claim Untimely?
<i>BEST BUY CO., INC., ET AL. v. HITACHI, LTD., ET AL.</i>						
Case No. 11-cv-05513						
Second Claim for Relief						
Violation of the Minnesota Antitrust Act of 1971						
Minn. Stat. Ann. §§ 325D.52, <i>et seq.</i>	4 Years (Minn. Stat. Ann. § 325D.64)	Unspecified dates of purchase of CRT Products from 3/1/1995-11/25/2007. ¶¶ 1, 9, 217, 221.	Alleges SOL has been tolled for all claims. No dates specified. ¶¶ 223-235.	11/8/2007 (Date of European Commission ("E.C.") announcement of investigation into CRT industry.)	11/14/2011	Yes. Any claim arising from purchases prior to 11/14/2007 is untimely.
<i>SIEGEL, AS TRUSTEE OF THE CIRCUIT CITY STORES, INC. v. HITACHI, LTD., ET AL.</i>						
Case No. 11-cv-05502						
Second Claim for Relief						
Violation of the California Cartwright Act						
Cal. Bus. & Prof. Code § 16720	4 Years (Cal. Bus. & Prof. Code § 16750.1)	Unspecified dates of purchase of CRT Products from 3/1/1995-11/25/2007. ¶¶ 1, 9, 215, 220.	Alleges SOL has been tolled for all claims. No dates specified. ¶¶ 222-234.	11/8/2007 (Date of E.C. announcement of investigation into CRT industry.)	11/14/2011	Yes. Any claim arising from purchases prior to 11/14/2007 is untimely.
Third Claim for Relief						
Violation of the California Unfair Competition Law						
Cal. Bus. & Prof. Code §§ 17200	4 Years (Cal. Bus. & Prof. Code § 17208)	Unspecified dates of purchase of CRT Products from 3/1/1995-11/25/2007. ¶¶ 1, 9, 215, 220.	Alleges SOL has been tolled for all claims. No dates specified. ¶¶ 222-234.	11/8/2007 (Date of E.C. announcement of investigation into CRT industry.)	11/14/2011	Yes. Any claim arising from purchases prior to 11/14/2007 is untimely.

¹ For the reasons explained in Defendants' moving papers, DAPs' allegations of fraudulent concealment cannot save their untimely state-law claims—even if the doctrine were to apply, which this Appendix assumes *arguendo*—and therefore Defendants do not address (and do not concede) whether each of the states at issue actually recognizes fraudulent concealment as a tolling doctrine.

Law	Statute of Limitations	Date Claim Accrued	Fraudulent Concealment Allegations	Date of Notice / Discovery	Filing Date	Claim Untimely?
Fifth Claim for Relief Violation of the Illinois Antitrust Act						
740 Ill. Comp. Stat. §§ 10/1, <i>et seq.</i>	4 Years 740 Ill. Comp. Stat. § 10/7	Unspecified dates of purchase of CRT Products from 3/1/1995-11/25/2007. ¶¶ 1, 9, 215, 220.	Alleges SOL has been tolled for all claims. No dates specified. ¶¶ 222-234.	11/8/2007 (Date of E.C. announcement of investigation into CRT industry.)	11/14/2011	Yes. Any claim arising from purchases prior to 11/14/2007 is untimely.
COMPUCOM SYSTEMS, INC. v. HITACHI, LTD., ET AL. Case No. 11-cv-06396						
Second Claim for Relief Violation of the California Cartwright Act						
Cal. Bus. & Prof. Code § 16720	4 Years (Cal. Bus. & Prof. Code § 16750.1)	Unspecified dates of purchase of CRT Products from 3/1/1995-11/25/2007. ¶¶ 1, 9, 209, 214.	Alleges SOL tolled until November 2007, when DOJ investigation became public, and class action complaints filed. ¶ 216.	11/8/2007 (Date of E.C. announcement of investigation into CRT industry.)	11/14/2011	Yes. Any claim arising from purchases prior to 11/14/2007 is untimely.
Third Claim for Relief Violation of the California Unfair Competition Law						
Cal. Bus. & Prof. Code §§ 17200	4 Years (Cal. Bus. & Prof. Code § 17208)	Unspecified dates of purchase of CRT Products from 3/1/1995-11/25/2007. ¶¶ 1, 9, 209, 214.	Alleges SOL tolled until November 2007, when DOJ investigation became public, and class action complaints filed. ¶ 216.	11/8/2007 (Date of E.C. announcement of investigation into CRT industry.)	11/14/2011	Yes. Any claim arising from purchases prior to 11/14/2007 is untimely.
Fourth Claim for Relief Violation of the New York Donnelly Act						
N.Y. Gen. Bus. Law §§ 340, <i>et seq.</i>	4 Years (N.Y. Gen. Bus. Law § 340(5))	Unspecified dates of purchase of CRT Products from 3/1/1995-11/25/2007. ¶¶ 1, 9, 209, 214.	Alleges SOL tolled until November 2007, when DOJ investigation became public, and class action complaints filed. ¶ 216.	11/8/2007 (Date of E.C. announcement of investigation into CRT industry.)	11/14/2011	Yes. Any claim arising from purchases prior to 11/14/2007 is untimely.

Law	Statute of Limitations	Date Claim Accrued	Fraudulent Concealment Allegations	Date of Notice / Discovery	Filing Date	Claim Untimely?
<i>COSTCO WHOLESALE CORPORATION v. HITACHI, LTD., ET AL.</i>						
Case No. 11-cv-06397						
Second Claim for Relief						
Violation of the California Cartwright Act						
Cal. Bus. & Prof. Code §§ 16700, <i>et seq.</i>	4 Years (Cal. Bus. & Prof. Code § 16750.1)	Unspecified dates of purchase of CRT Products from 3/1/1995-11/25/2007. ¶¶ 1, 9, 159.	Alleges SOL tolled until “late November 2007,” when investigations by the U.S. and other antitrust authorities “became widely reported.” ¶ 160.	11/8/2007 (Date of E.C. announcement of investigation into CRT industry.)	11/14/2011	Yes. Any claim arising from purchases prior to 11/14/2007 is untimely.
Third Claim for Relief						
Violation of the Washington Consumer Protection Act						
Wash. Rev. Code § 19.86.030	4 Years (Wash. Rev. Code § 19.86.120)	Unspecified dates of purchase of CRT Products from 3/1/1995-11/25/2007. ¶¶ 1, 9, 159.	Alleges SOL tolled until “late November 2007,” when investigations by the U.S. and other antitrust authorities “became widely reported.” ¶ 160.	11/8/2007 (Date of E.C. announcement of investigation into CRT industry.)	11/14/2011	Yes. Any claim arising from purchases prior to 11/14/2007 is untimely.
Fourth Claim for Relief						
Violation of the Arizona Antitrust Act						
Ariz. Rev. Stat. §§ 44-1401, <i>et seq.</i>	4 Years (Ariz. Rev. Stat. § 44-1410(b))	Unspecified dates of purchase of CRT Products from 3/1/1995-11/25/2007. ¶¶ 1, 9, 159.	Alleges SOL tolled until “late November 2007,” when investigations by the U.S. and other antitrust authorities “became widely reported.” ¶ 160.	11/8/2007 (Date of E.C. announcement of investigation into CRT industry.)	11/14/2011	Yes. Any claim arising from purchases prior to 11/14/2007 is untimely.
Fifth Claim for Relief						
Violation of the Florida Deceptive and Unfair Trade Practices Act						
Fla. Stat. Ann. §§ 501.201, <i>et seq.</i>	4 Years (Fla. Stat. Ann. § 95.11(3)(f))	Unspecified dates of purchase of CRT Products from 3/1/1995-11/25/2007. ¶¶ 1, 9, 159.	Alleges SOL tolled until “late November 2007,” when investigations by the U.S. and other antitrust authorities “became widely reported.” ¶ 160.	11/8/2007 (Date of E.C. announcement of investigation into CRT industry.)	11/14/2011	Yes. Any claim arising from purchases prior to 11/14/2007 is untimely.

Law	Statute of Limitations	Date Claim Accrued	Fraudulent Concealment Allegations	Date of Notice / Discovery	Filing Date	Claim Untimely?
Sixth Claim for Relief Violation of the Illinois Antitrust Act						
740 Ill. Comp. Stat. §§ 10/1, <i>et seq.</i>	4 Years (740 Ill. Comp. Stat. § 10/7(2))	Unspecified dates of purchase of CRT Products from 3/1/1995-11/25/2007. ¶¶ 1, 9, 159.	Alleges SOL tolled until “late November 2007,” when investigations by the U.S. and other antitrust authorities “became widely reported.” ¶ 160.	11/8/2007 (Date of E.C. announcement of investigation into CRT industry.)	11/14/2011	Yes. Any claim arising from purchases prior to 11/14/2007 is untimely.
INTERBOND CORPORATION OF AMERICA v. HITACHI, LTD., ET AL. Case No. 11-cv-06275						
Second Claim for Relief Violation of the Florida Deceptive and Unfair Trade Practices Act						
Fla. Stat. Ann. §§ 501.201, <i>et seq.</i>	4 Years (Fla. Stat. Ann. § 95.11(3)(f))	Unspecified dates of purchase of CRT Products from 3/1/1995-11/25/2007. ¶¶ 1, 9, 207, 212.	Alleges SOL has been tolled for all claims. No dates specified. ¶¶ 214-226.	11/8/2007 (Date of E.C. announcement of investigation into CRT industry.)	11/14/2011	Yes. Any claim arising from purchases prior to 11/14/2007 is untimely.
OFFICE DEPOT, INC. v. HITACHI, LTD., ET AL. Case No. 11-cv-06276						
Second Claim for Relief Violation of the Florida Deceptive and Unfair Trade Practices Act						
Fla. Stat. Ann. §§ 501.201, <i>et seq.</i>	4 Years (Fla. Stat. Ann. § 95.11(3)(f))	Unspecified dates of purchase of CRT Products from 3/1/1995-11/25/2007. ¶¶ 1, 9, 208, 213.	Alleges SOL has been tolled for all claims. No dates specified. ¶¶ 215-227.	11/8/2007 (Date of E.C. announcement of investigation into CRT industry.)	11/14/2011	Yes. Any claim arising from purchases prior to 11/14/2007 is untimely.
Third Claim for Relief Violation of the California Cartwright Act						
Cal. Bus. & Prof. Code § 16720	4 Years (Cal. Bus. & Prof. Code § 16750.1)	Unspecified dates of purchase of CRT Products from 3/1/1995-11/25/2007. ¶¶ 1, 9, 208, 213.	Alleges SOL has been tolled for all claims. No dates specified. ¶¶ 215-227.	11/8/2007 (Date of E.C. announcement of investigation into CRT industry.)	11/14/2011	Yes. Any claim arising from purchases prior to 11/14/2007 is untimely.

Law	Statute of Limitations	Date Claim Accrued	Fraudulent Concealment Allegations	Date of Notice / Discovery	Filing Date	Claim Untimely?
Fourth Claim for Relief						
Violation of the California Unfair Competition Law						
Cal. Bus. & Prof. Code §§ 17200	4 Years (Cal. Bus. & Prof. Code § 17208)	Unspecified dates of purchase of CRT Products from 3/1/1995-11/25/2007. ¶¶ 1, 9, 208, 213.	Alleges SOL has been tolled for all claims. No dates specified. ¶¶ 215-227.	11/8/2007 (Date of E.C. announcement of investigation into CRT industry.)	11/14/2011	Yes. Any claim arising from purchases prior to 11/14/2007 is untimely.
P.C. RICHARD & SON LONG ISLAND CORPORATION, ET AL. v. HITACHI, LTD., ET AL.						
Case No. 12-cv-02648						
Second Claim for Relief						
Violation of State Antitrust Laws						
Ariz. Rev. Stat. §§ 44-1401, <i>et seq.</i>	4 Years (Ariz. Rev. Stat. § 44-1410(b))	Unspecified dates of purchase of CRT Products from 3/1/1995-11/25/2007. ¶¶ 1, 9, 213, 218.	Alleges SOL tolled until November 2007, when DOJ investigation became public, and class action complaints filed. ¶ 220-232.	11/8/2007 (Date of E.C. announcement of investigation into CRT industry.)	11/14/2011	Yes. Any claim arising from purchases prior to 11/14/2007 is untimely.
740 Ill. Comp. Stat. §§ 10/1, <i>et seq.</i>	4 Years (740 Ill. Comp. Stat. § 10/7(2))	Unspecified dates of purchase of CRT Products from 3/1/1995-11/25/2007. ¶¶ 1, 9, 213, 218.	Alleges SOL tolled until November 2007, when DOJ investigation became public, and class action complaints filed. ¶ 220-232.	11/8/2007 (Date of E.C. announcement of investigation into CRT industry.)	11/14/2011	Yes. Any claim arising from purchases prior to 11/14/2007 is untimely.
Mich. Comp. Laws Ann. §§ 445.771, <i>et seq.</i>	4 Years (Mich. Comp. Laws Ann. § 445.781)	Unspecified dates of purchase of CRT Products from 3/1/1995-11/25/2007. ¶¶ 1, 9, 213, 218.	Alleges SOL tolled until November 2007, when DOJ investigation became public, and class action complaints filed. ¶ 220-232.	11/8/2007 (Date of E.C. announcement of investigation into CRT industry.)	11/14/2011	Yes. Any claim arising from purchases prior to 11/14/2007 is untimely.
N.Y. Gen. Bus. Law §§ 340, <i>et seq.</i>	4 Years (N.Y. Gen. Bus. Law § 340(5))	Unspecified dates of purchase of CRT Products from 3/1/1995-11/25/2007. ¶¶ 1, 9, 213, 218.	Alleges SOL tolled until November 2007, when DOJ investigation became public, and class action complaints filed. ¶ 220.	11/8/2007 (Date of E.C. announcement of investigation into CRT industry.)	11/14/2011	Yes. Any claim arising from purchases prior to 11/14/2007 is untimely.

Law	Statute of Limitations	Date Claim Accrued	Fraudulent Concealment Allegations	Date of Notice / Discovery	Filing Date	Claim Untimely?
TARGET CORP., ET AL. v. CHUNGWA PICTURE TUBES, LTD. ET AL.						
Case No. 11-cv-05514						
Second Claim for Relief						
Violation of the California Cartwright Act						
Cal. Bus. & Prof. Code § 16720	4 Years (Cal. Bus. & Prof. Code § 16750.1)	Unspecified dates of purchase of CRT Products from 3/1/1995-11/25/2007. ¶¶ 1, 9, 226, 231.	Alleges SOL has been tolled for all claims. No dates specified. ¶¶ 233-245.	11/8/2007 (Date of E.C. announcement of investigation into CRT industry.)	11/14/2011	Yes. Any claim arising from purchases prior to 11/14/2007 is untimely.
Third Claim for Relief						
Violation of State Antitrust and Unfair Competition Laws						
Cal. Bus. & Prof. Code §§ 17200, <i>et seq.</i>	4 Years (Cal. Bus. & Prof. Code § 17208)	Unspecified dates of purchase of CRT Products from 3/1/1995-11/25/2007. ¶¶ 1, 9, 226, 231.	Alleges SOL has been tolled for all claims. No dates specified. ¶¶ 233-245.	11/8/2007 (Date of E.C. announcement of investigation into CRT industry.)	11/14/2011	Yes. Any claim arising from purchases prior to 11/14/2007 is untimely.
Ariz. Rev. Stat. §§ 44-1401, <i>et seq.</i>	4 Years (Ariz. Rev. Stat. § 44-1410(b))	Unspecified dates of purchase of CRT Products from 3/1/1995-11/25/2007. ¶¶ 1, 9, 226, 231.	Alleges SOL has been tolled for all claims. No dates specified. ¶¶ 233-245.	11/8/2007 (Date of E.C. announcement of investigation into CRT industry.)	11/14/2011	Yes. Any claim arising from purchases prior to 11/14/2007 is untimely.
Fla. Stat. Ann. §§ 501.201, <i>et seq.</i>	4 Years (Fla. Stat. Ann. § 95.11(3)(f))	Unspecified dates of purchase of CRT Products from 3/1/1995-11/25/2007. ¶¶ 1, 9, 226, 231.	Alleges SOL has been tolled for all claims. No dates specified. ¶¶ 233-245.	11/8/2007 (Date of E.C. announcement of investigation into CRT industry.)	11/14/2011	Yes. Any claim arising from purchases prior to 11/14/2007 is untimely.
740 Ill. Comp. Stat. §§ 10/1, <i>et seq.</i>	4 Years (740 Ill. Comp. Stat. § 10/7(2))	Unspecified dates of purchase of CRT Products from 3/1/1995-11/25/2007. ¶¶ 1, 9, 226, 231.	Alleges SOL has been tolled for all claims. No dates specified. ¶¶ 233-245.	11/8/2007 (Date of E.C. announcement of investigation into CRT industry.)	11/14/2011	Yes. Any claim arising from purchases prior to 11/14/2007 is untimely.
Iowa Code Ann. §§ 553.1, <i>et seq.</i>	4 Years (Iowa Code Ann. § 553.16)	Unspecified dates of purchase of CRT Products from 3/1/1995-11/25/2007. ¶¶ 1, 9, 226, 231.	Alleges SOL has been tolled for all claims. No dates specified. ¶¶ 233-245.	11/8/2007 (Date of E.C. announcement of investigation into CRT industry.)	11/14/2011	Yes. Any claim arising from purchases prior to 11/14/2007 is untimely.

Law	Statute of Limitations	Date Claim Accrued	Fraudulent Concealment Allegations	Date of Notice / Discovery	Filing Date	Claim Untimely?
Kan. Stat. Ann. §§ 60-501, <i>et seq.</i>	3 Years (Kan. Stat. Ann. § 60-512(2))	Unspecified dates of purchase of CRT Products from 3/1/1995-11/25/2007. ¶¶ 1, 9, 226, 231.	Alleges SOL has been tolled for all claims. No dates specified. ¶¶ 233-245.	11/8/2007 (Date of E.C. announcement of investigation into CRT industry.)	11/14/2011	Yes.
Mass. Gen. Laws Ann. ch. 93A §§ 2, <i>et seq.</i>	4 Years (Mass. Gen. Laws Ann. ch. 260 § 5A)	Unspecified dates of purchase of CRT Products from 3/1/1995-11/25/2007. ¶¶ 1, 9, 226, 231.	Alleges SOL has been tolled for all claims. No dates specified. ¶¶ 233-245.	11/8/2007 (Date of E.C. announcement of investigation into CRT industry.)	11/14/2011	Yes. Any claim arising from purchases prior to 11/14/2007 is untimely.
Mich. Comp. Laws Ann. §§ 445.771, <i>et seq.</i>	4 Years (Mich. Comp. Laws Ann. § 445.781)	Unspecified dates of purchase of CRT Products from 3/1/1995-11/25/2007. ¶¶ 1, 9, 226, 231.	Alleges SOL has been tolled for all claims. No dates specified. ¶¶ 233-245.	11/8/2007 (Date of E.C. announcement of investigation into CRT industry.)	11/14/2011	Yes. Any claim arising from purchases prior to 11/14/2007 is untimely.
Minn. Stat. Ann. §§ 325D.50, <i>et seq.</i>	4 Years (Minn. Stat. Ann. § 325D.64)	Unspecified dates of purchase of CRT Products from 3/1/1995-11/25/2007. ¶¶ 1, 9, 226, 231.	Alleges SOL has been tolled for all claims. No dates specified. ¶¶ 233-245.	11/8/2007 (Date of E.C. announcement of investigation into CRT industry.)	11/14/2011	Yes. Any claim arising from purchases prior to 11/14/2007 is untimely.
Miss. Code Ann. §§ 75-21-1, <i>et seq.</i>	3 Years (Miss. Code Ann. § 15-1-49)	Unspecified dates of purchase of CRT Products from 3/1/1995-11/25/2007. ¶¶ 1, 9, 226, 231.	Alleges SOL has been tolled for all claims. No dates specified. ¶¶ 233-245.	11/8/2007 (Date of E.C. announcement of investigation into CRT industry.)	11/14/2011	Yes.
Neb. Rev. Stat. §§ 59-801, <i>et seq.</i>	4 Years (Neb. Rev. Stat. § 25-206)	Unspecified dates of purchase of CRT Products from 3/1/1995-11/25/2007. ¶¶ 1, 9, 226, 231.	Alleges SOL has been tolled for all claims. No dates specified. ¶¶ 233-245.	11/8/2007 (Date of E.C. announcement of investigation into CRT industry.)	11/14/2011	Yes. Any claim arising from purchases prior to 11/14/2007 is untimely.
Nev. Rev. Stat. §§ 598A, <i>et seq.</i>	4 Years (Nev. Rev. Stat. § 598A.220)	Unspecified dates of purchase of CRT Products from 3/1/1995-11/25/2007. ¶¶ 1, 9, 226, 231.	Alleges SOL has been tolled for all claims. No dates specified. ¶¶ 233-245.	11/8/2007 (Date of E.C. announcement of investigation into CRT industry.)	11/14/2011	Yes. Any claim arising from purchases prior to 11/14/2007 is untimely.

Law	Statute of Limitations	Date Claim Accrued	Fraudulent Concealment Allegations	Date of Notice / Discovery	Filing Date	Claim Untimely?
N.M. Stat. Ann. §§ 57-1-1, <i>et seq.</i>	4 Years (N.M. Stat. Ann. § 57-1-12)	Unspecified dates of purchase of CRT Products from 3/1/1995-11/25/2007. ¶¶ 1, 9, 226, 231.	Alleges SOL has been tolled for all claims. No dates specified. ¶¶ 233-245.	11/8/2007 (Date of E.C. announcement of investigation into CRT industry.)	11/14/2011	Yes. Any claim arising from purchases prior to 11/14/2007 is untimely.
N.Y. Gen. Bus. Law §§ 340, <i>et seq.</i>	4 Years (N.Y. Gen. Bus. Law § 340(5))	Unspecified dates of purchase of CRT Products from 3/1/1995-11/25/2007. ¶¶ 1, 9, 226, 231.	Alleges SOL has been tolled for all claims. No dates specified. ¶¶ 233-245.	11/8/2007 (Date of E.C. announcement of investigation into CRT industry.)	11/14/2011	Yes. Any claim arising from purchases prior to 11/14/2007 is untimely.
N.C. Gen. Stat. §§ 75-1, <i>et seq.</i>	4 Years (N.C. Gen. Stat. § 75-16.2)	Unspecified dates of purchase of CRT Products from 3/1/1995-11/25/2007. ¶¶ 1, 9, 226, 231.	Alleges SOL has been tolled for all claims. No dates specified. ¶¶ 233-245.	11/8/2007 (Date of E.C. announcement of investigation into CRT industry.)	11/14/2011	Yes. Any claim arising from purchases prior to 11/14/2007 is untimely.
SCHULTZE AGENCY SERVICES, LLC ON BEHALF OF TWEETER OPCO, LLC AND TWEETER NEWCO, LLC v. HITACHI, LTD., ET AL.						
Case No. 12-cv-02649						
Second Claim for Relief						
Violation of the Massachusetts Antitrust Act						
Mass. Gen. Laws Ann. ch. 93A §§ 2, <i>et seq.</i>	4 Years (Mass. Gen. Laws Ann. ch. 260 § 5A)	Unspecified dates of purchase of CRT Products from 3/1/1995-11/25/2007. ¶¶ 1, 9, 211, 216.	Alleges SOL tolled until November 2007, when DOJ investigation became public, and class action complaints filed. ¶ 218-230.	11/8/2007 (Date of E.C. announcement of investigation into CRT industry.)	11/14/2011	Yes. Any claim arising from purchases prior to 11/14/2007 is untimely.